



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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JUL 30 2008

Ref: 8EPR-N

Walter C. Waidelich, Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84118

John Njord, Executive Director
Utah Department of Transportation
4105 South 2700 West
Salt Lake City, UT 84119

Re: Comments on I-15 Corridor Utah County to
Salt Lake County, Final Environmental Impact
Statement (FEIS): CEQ#: 2008024

Dear Messrs: Waidelich and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the I-15 Corridor Final Environmental Impact Statement (FEIS). The proposed action includes improvements to approximately 43 miles of Interstate 15 in Utah and Salt Lake Counties. The project's southern terminus is the South Payson-I-15 interchange, Exit 248, in the City of Payson; its northern terminus is the 12300 South I-15 interchange, Exit 291, in the City of Draper. The purpose of this project is to address the anticipated north-south mobility needs within the new I-15 corridor through the year 2030. The Preferred Alternative includes the following:

- Reconstruction of I-15, including addition of general-purpose lanes to I-15
- Extension of express lanes to US-6 in Spanish Fork
- Reconstruction of existing interchanges
- Construction of Option C at the American Fork main Street Interchange
- Construction of Option D in the Provo/Orem area
- Construction of a new interchange at North Lehi
- Improvements to bridges that cross the roadway
- Improvements to connecting arterial streets

- Construction of structures to accommodate new undercrossing at Provo 500 West and Orem 1200 North

EPA believes that the Preferred Alternative arguably represents the Least Environmentally Damaging Practicable Alternative (LEDPA), and has the least impacts to wetlands according to acreage and will reduce wetland impacts by 30% over other alternatives. The highest number of acres of wetland impacts within the Provo/Orem segment resulted from the frontage roads which were eliminated in the Preferred Alternative. However, we have concerns that the Preferred Alternative has greater impacts to higher quality wetlands, especially in American Fork, despite having the lowest total acreage of impacts. The American Fork Main Street Interchange area contains proportionally more Category 2 wetlands than the rest of the study area and the preferred American Forks Main Street Option C impacts 0.8 acres more of Category 2 wetlands than Option A, which has similar total acreage impacts.

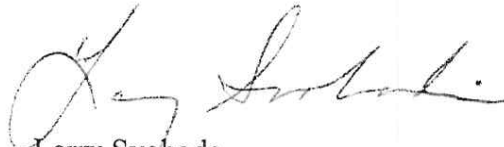
EPA has concerns with the Mobile Air Source Toxic (MSATS) language in the FEIS. EPA and FHWA have been negotiating language on MSATS for some time. We have not yet reached consensus regarding language both agencies agree on for inclusion in EISs. We also note that the draft transportation conformity determination has not been completed for this project. EPA requests a copy of the draft conformity determination prior to issuance of the Record of Decision for our review. Regarding air quality mitigation, we note that the final document lacks specificity regarding construction impacts and mitigation measures. The Best Management Practices (BMPs) for this project should include measures that would reduce particulate emissions from both construction diesels and fugitive dust.

Finally, we commend FHWA and UDOT on disclosure of carbon dioxide emission estimates for the Baseline, No-Build and Preferred Alternative scenarios. The Regional emissions estimates from project-influenced roads indicate a significant increase in carbon dioxide emissions between the Baseline and Preferred Alternative (approximately 478,000 tons per year). Please explain why this increase is not consistent with estimates contained in the *Mountain View Corridor EIS* which indicate that the State's carbon dioxide emissions from highways are estimated to decrease by 6% during the same timeframe.

EPA appreciates the opportunity to review this project. We also acknowledge the complexities in designing a highway such as this one in a manner that meets the purpose and need, considers and mitigates environmental impacts and attempts to meet the needs of the local communities.

If you have any questions or would like to discuss our comments, please contact me at (303) 312-6004 or Robin Coursen of my staff at (303)312-6695.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Cc: Greg Punske, FHWA (email) and signed copy
Ed Woolford, FHWA (email)
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